

# **EXHIBIT I**

**Robert Intartaglio**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Johnson, et al. v. The Islamic Republic of Iran</i>	18-cv-12344 (GBD)(SN) ECF Case

**DECLARATION OF ROBERT INTARTAGLIO**

I, Robert Intartaglio, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than eighteen (18) years of age and I have personal knowledge of and am competent to testify to the matters stated in this declaration. I was a citizen of the United States on September 11, 2001, and I remain so today.
2. On September 11, 2001, I was present in New York City when the terrorist attacks on the World Trade Center (WTC) occurred. I was a police officer with the New York Police Department (NYPD) assigned to Brooklyn North. I was on election duty at PS 29 on Staten Island when I was notified there was a department-wide mobilization and instructed to report to Precinct 120 to be assigned to a detail. At the precinct we learned of the attacks on the WTC. I was one of a group of officers assigned to provide security to a National Grid Gas facility on Staten Island. At the time there were concerns that there might be additional attacks on New York's infrastructure. I remained at the facility on Staten Island until I was relieved sometime late that evening.

3. The next day NYPD began working twelve-hour shifts. Between September 12 and September 24, I worked nine such shifts at Ground Zero. My assignments at Ground Zero included working on the bucket brigade looking for evidence and human remains, perimeter security to

ensure no unauthorized individuals were allowed to enter the crime scene, and escorting civilians into and out of the buildings that had not been destroyed around Ground Zero to allow them to collect essential items that had been left when they fled the scene on September 11. Ground Zero was burning. Around the entire area, gray ash was falling from the sky to such an extent that it appeared as if it was snowing. We were provided no protective gear whatsoever. I recall seeing crews from Con Edison wearing full protective suits with masks and face shields while we worked in our uniforms. We knew that there would be health consequences for all of us exposed to this toxic environment.

4. On September 25, I was assigned to work at the Fresh Kills Landfill on Staten Island. I worked six shifts at the landfill. My last shift was on October 3. We were working, sifting through the material that had been brought in from Ground Zero looking for evidence and the remains of victims of the attacks.

5. During the time I was working at Ground Zero and the landfill, I began having difficulty breathing, chest and back pain, and flu-like symptoms. On October 8, 2001 I took sick leave for the first time in seven years. I was seen by a private physician and diagnosed with bronchitis and pulled muscles in my back. I was prescribed two antibiotics and a pain killer. I was at home in severe pain from October 8 through October 18. On the eighteenth, due to severe pain, shortness of breath, and severe tightness in my chest and back, I was taken by ambulance to Staten Island University Hospital. I was diagnosed with a pneumothorax and pneumonia. I was hospitalized and a chest tube was inserted to drain the fluid from my lung and I was administered antibiotics and morphine intravenously. I was discharged on October 27 and told that I had suffered from a condition called empyema where pus accumulates in the pleural area between the lungs and chest wall. The intravenous antibiotics were continued for five weeks following my

hospitalization. I remained on sick leave until December 18 and returned to full duty on January 3, 2002.

6. I continued to suffer from chest pain, shortness of breath, and soreness in my nose and throat even after the medical treatment I received in 2001. I heard about the World Trade Center Health Program (WTCHP) through the police union and registered for the monitoring program. The physical injuries and conditions I suffered due to my exposure to the toxins present at Ground Zero and Fresh Kills Landfill immediately after the attacks have been confirmed through the WTCHP and determined to be eligible for compensation by the Victim Compensation Fund (VCF).

7. Following the evaluation of my conditions by the WTCHP, I pursued a claim with the VCF and was found eligible for compensation for asthma, chronic rhinitis, and esophageal reflux. I still suffer from these conditions. A true and correct copy of the VCF eligibility determination letter documenting the physical injuries I suffered as a result of the attacks on 9/11 is submitted with this Declaration as part of this exhibit.

I DECLARE UNDER PENALTY OF PERJURY that the foregoing is true and correct.

DATED this 10<sup>th</sup> day of May, 2025.



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Declarant Robert Intartaglio



September 11th  
Victim Compensation Fund

October 1, 2014

ROBERT INTARTAGLIO, JR.



Dear Robert Intartaglio, Jr.:

Your Eligibility Form for the September 11th Victim Compensation Fund (VCF) has been reviewed. You submitted an Eligibility Form for Personal Injury Claimants. Your claim number is VCF0012431. The Claims Evaluator determined that your Eligibility Form was substantially complete on October 1, 2014. As stated in the Regulations and on the Eligibility Form, by filing a substantially complete Eligibility Form, you have waived your right to file or be a party to a September 11th-related lawsuit.<sup>1</sup> For more information about this topic, please review Frequently Asked Questions (FAQ) 7.1-7.4 on <http://www.vcf.gov/faq.html>.

#### The Decision on your Claim

The VCF has determined that you meet the eligibility criteria established in the statute (the Zadroga Act and the original statute) and regulations and therefore the VCF will review your Compensation Form and supporting materials to determine the amount of any award. Based on the information you submitted and information the VCF has received from the World Trade Center Health Program (WTCHP), you have been found eligible for the following injuries:

- ASTHMA, UNSPECIFIED, UNSPECIFIED STATUS
- CHRONIC RHINITIS
- ESOPHAGEAL REFLUX

Please note that there are several reasons why an injury that you think should be eligible is not listed above. First, for non-traumatic injuries, the description of the injury is based on the information provided by the WTCHP and there can be several alternative descriptions for the same injury. Additionally, a WTCHP physician may have provided testing or treatment for an injury even if the WTCHP has not certified that injury for treatment. Finally, your injury may not be listed if it was only recently certified for treatment by the WTCHP. The VCF regularly receives updated information from the WTCHP and will notify you if additional injuries have become eligible.

#### What Happens Next

<sup>1</sup> The Statute (the Air Transportation Safety and System Stabilization Act as amended by the Zadroga Act) and the Regulations are located at <http://www.vcf.gov/lawRulesOtherDocs.html>.



September 11th  
Victim Compensation Fund

The VCF will determine your compensation award based solely on the eligible injuries listed above. In order for the VCF to do so, you must submit the Compensation Form for Personal Injury Claimants and the required supporting documents. If you have not already done so, please submit the Compensation Form and the required supporting documents as soon as possible. You are encouraged to submit the Compensation Form through the VCF's web-based claim system at [www.vcf.gov](http://www.vcf.gov). If you wish to complete the Compensation Form in hardcopy, you may request the form by contacting the toll-free Helpline at 1-855-885-1555. For the hearing impaired, please call 1-855-885-1558 (TDD). If you are calling from outside the United States, please call 1-202-353-0356.

In addition to the Compensation Form, please also complete and submit the VCF ACH Payment Information Form. This form can be found on our website in Section 8 of the Frequently Asked Questions (FAQs). The completed form must be submitted before the VCF can arrange for any payment.

The VCF will be able to determine your compensation award based on the eligible conditions after all compensation related documents are submitted. When you receive an award letter, you will have the right to appeal. In that appeal, you have the right to assert additional injuries that you believe are eligible and for which you believe you should be compensated. For purposes of the statutory deadlines, the injuries listed in your claim form and the injuries certified as eligible will be deemed "filed". You will receive instructions on the appeal process when you receive the letter with details of your compensation award.

If you have questions about the information in this letter or the claims process in general, please contact our toll-free Helpline at the number noted above. Every effort will be made to respond to your inquiries as soon as possible.

Sincerely,

September 11th Victim Compensation Fund